

Believille, IL . Memphis TN

William P. Gavin

Licensed in Ellinois, Missouri, Townsesse and Arkansas

billg@gavinlaw.com

October 10, 2016

United States Environmental Protection Agency Region Five Ralph Metcalfe Federal Building 77 West Jackson Blvd. Chicago, IL 60604

Re: Dupo Illinois Railroad Yards-Freedom of Information Request

Dear Sir:

Pursuant to the provisions of the Freedom Information Act, 5 USC §552, the United States Protection Agency is requested to copy and produce to the undersigned at Gavin Law Firm 1 South Church Street Suite 203 Belleville, Illinois 62220 the following documents:

## DEFINITIONS

- A. The term "Dupo, Illinois railroad facilities" refers to the railroad yards operated by Missouri Pacific Railroad Company and Union Pacific Railroad Company, successor to Missouri Pacific Railroad Company in Dupo, Illinois from 1972-present.
- B. The term "the railroads" includes both Missouri Pacific Railroad Company and Union Pacific Railroad Company, individually and as successor to Missouri Pacific Railroad Company in Dupo

## DOCUMENTS TO BE PRODUCED

- Any and all documents reflecting environmental inspections of the Dupo, Illinois railroad facilities for the detection of environmental contaminants in the soil, water and air on the Dupo, Illinois railroad facilities from 1972 to present.
- Any and all documents reflecting environmental inspections of the Dupo, Illinois railroad facilities for the detection of diesel fuel, benzene, and/or other organic chemicals in the soil, water, and air of the Dupo, Illinois railroad facilities from 1972 to present.
- Any and all documents reflecting remediation of contaminated ground and/or waters from 1972 to present in the Dupo, Illinois railroad facilities.

- 4. Any and all communications sent to the railroads from the United States Environmental Protection Agency (USEPA) concerning alleged contaminated ground, waters and/or air from 1972 to present in the Dupo, Illinois railroad facilities.
- Any and all communications received by USEPA from the railroads concerning alleged contaminated ground, waters, and/or air from 1972 to present in the Dupo, Illinois railroad facilities.
- Any and all communications sent by USEPA to any other agency, department or employee of the United States government, the Illinois government or St. Clair County, Illinois from 1972 to present concerning alleged contaminated ground, waters, and/or air in the Dupo, Illinois railroad facilities.
- Any and all communications received by USEPA from any other agency, department or employee of the United States government, the Illinois government or St. Clair County, Illinois from 1972 to present concerning alleged contaminated ground, waters, and/or air in the Dupo, Illinois railroad facilities.
- Any and all reports, photographs, video recordings, laboratory analysis reports, and documents reflecting alleged contaminated ground, waters, and/or air in the Dupo, Illinois railroad facilities dated 1972 to present.

Very truly yours,

GAVIN LAW FIRM

William P. Gavin

WPG/tmm